



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

OCT 19 2015

Dr. Jane Summerson  
Hawaii Clean Energy PEIS Document Manager  
U.S. Department of Energy – NNSA  
P.O. Box 5400, Bldg. 401 KAFB East  
Albuquerque, NM 87185

Subject: Hawaii Clean Energy Final Programmatic Environmental Impact Statement (CEQ# 20150261)

Dear Dr. Summerson:

The U.S. Environmental Protection Agency has reviewed the Hawaii Clean Energy Final Programmatic Environmental Impact Statement. Our comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Programmatic Environmental Impact Statement and provided comments to the Department of Energy on July 17, 2014. We rated the Draft PEIS as *Environmental Concerns – Insufficient Information* (EC-2) because we identified issues that should be addressed in greater detail in order to provide clarity about potential environmental impacts and permitting. As a cooperating agency, we worked closely with DOE as it sought to address these concerns, and we submitted further recommendations on August 25, 2014.

We commend the DOE for its extensive interagency coordination on this project and appreciate the additional information that has been incorporated into the Final PEIS. In response to our comments, the Final PEIS presents new material on current energy usage, current levels of renewable energy generation, estimated renewable energy potential, and the status of Hawaii Clean Energy Initiative (HCEI) renewable energy and energy efficiency goals. It includes additional information on programs in Hawaii that focus on redevelopment of brownfield sites that can, sometimes, be used for clean energy projects, and discusses EPA's Clean Power Plan Proposed Rule and EPA's Greenhouse Gas Reporting Program. As requested, the Final PEIS provides clarity on Clean Water Act Section 401 and CWA Section 404(b)(1) permitting responsibilities, particularly in conjunction with sea water air conditioning and ocean thermal energy conversion. Finally, per our recommendations, the Final PEIS has expanded the discussion on multi-modal transportation and provided additional information on car sharing and bike sharing.

The EPA strongly supports the state of Hawaii's commitment to achieving the HCEI goals of reducing reliance on fossil fuels and meeting 100 percent of Hawaii's energy needs by 2045 using clean energy. The Final PEIS will provide the public with a valuable reference document containing information about activities and technologies that are currently, or could reasonably be, deployed in Hawaii. Accelerating the development of renewable resources and the deployment of clean energy technologies will help

Hawaii meet its energy demand, reduce dependence on imported oil, create new jobs, and provide for increased energy security, while reducing greenhouse gas emissions.

We appreciate the opportunity to review this Final PEIS. When the Record of Decision is signed, please send one copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at 415-972-3521, or contact Ann McPherson, the lead reviewer for this project. Ann can be reached at 415-972-3545 or [mcpherson.ann@epa.gov](mailto:mcpherson.ann@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Martyn Goforth', with a long horizontal flourish extending to the right.

Kathleen Martyn Goforth, Manager  
Environmental Review Section